HST Safeguarding & Child Protection Policy September 2025 – August 2026

We recommend tutors take a photograph on this front cover and page 12 (Dealing with a Disclosure of Abuse) on their phones, for reference.

Safeguarding is EVERYONE's responsibility at Home-School Tutoring

Everyone at Home-School Tutoring fully recognises their responsibility to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements are in place to identify, assess and support those children who may be suffering harm. Home-School Tutoring also recognise the importance of being child-centred and ensuring that the best interests of the child are paramount.

Home School Tutoring UK Ltd has Licensed Associate Businesses in various parts of the UK. Each of these Licensed Associate Businesses is run and owned by the Home-School Tutoring Area Director who is also a Designated Safeguarding Lead and takes full responsibility for all actions which are taken in conducting that Area Business. Policies are jointly agreed and overseen centrally.

Key Contacts:

- **In an emergency and if there is a risk of IMMEDIATE HARM always call 999 or 111. Anyone can make a referral**. Do not wait to speak to others, you can make the call.
- **Every Local Authority has a telephone number for you to call if there if there is a risk of serious harm to a child (Children's Services). In these circumstances DO NOT WAIT to speak to your Area Director. You can make a referral. For your Local Authority, the contact is:**

BUCKINGHAMSHIRE COUNCIL PUPILS:

For **urgent safeguarding concerns** the quickest way to let our MASH Team know is by calling them on:

- 01296 383 962 between 9am to 5:30pm Monday to Thursday, 9am to 5pm Friday.
- 0800 999 7677 before 9am, after 5:30pm (5pm on a Friday) or at weekends (Emergency Duty Team)

BEDFORD BOROUGH PUPILS:

- For professionals: Call 01234 718 211 immediately (office hours)
- For out of hours reports call 0300 300 8123

CENTAL BEDFORDSHIRE COUNCIL PUPILS:

- **Access and Inclusion Hub: 0300 300 8585**
- **Alternatively, Sally Butterworth on 0300 300 8597**

MILTON KEYNES COUNCIL PUPILS:

Report your concerns about the safety and well-being of a child to the Multi-Agency Safeguarding Hub (MASH) 9am-5pm Mon-Thurs and 9am-4.30pm on Fri by:

- calling **01908 253169 or 01908 253170**
- emailing children@milton-keynes.gov.uk
- Outside these hours contact the Emergency Social work team on **01908 265545.**

- **Your Own Area Director is your first point of contact for any safeguarding concerns and your named Designated Safeguarding Lead (DSL):** Always let them know if you have called in a concern.

Helen Manly 07974712301
helen.manly@homeschooltutoring.co.uk

- **In some cases, children and families need Early Help (to stop issues escalating). Please discuss Early Help with your Area Director as appropriate.**
- Each school has their own Designated Safeguarding Lead (DSL). It is important that you follow the school's own guidance and procedures when working in a school.
- **Annalise Price-Thomas is the National Designated Safeguarding Lead for Home-School Tutoring UK and the Home-School Tutoring Group Email:** annalise@homeschooltutoring.co.uk

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SECTION 1: INTRODUCTION, OVERVIEW and DEFINITIONS

1.1 <u>Introduction</u>

The purpose of this policy is:

- ensure all **Home-School Tutoring stakeholders** know the importance of child protection and safeguarding pupils and of their responsibilities for identifying and reporting actual or suspected abuse, neglect or concerns about a child's welfare.
- Ensure tutees, tutors, parents, schools and Local Authorities are aware that Home-School Tutoring takes the safeguarding agenda seriously and will follow appropriate procedures for identifying and reporting abuse, neglect or concerns about a child's welfare and for dealing with allegations against tutors or other workers.
- to promote effective liaison between Home-School Tutoring, other agencies, and schools to work together for the protection of pupils.
- to ensure that all tutors and all Home-School Tutoring office-based workers fully recognise their responsibility to safeguard children, promote the welfare of children and work together with other agencies to identify, assess and support those children who may be suffering harm.
- Ensure that all workers and tutors who work with or for Home-School Tutoring who by their very virtue of Home-School Tutoring being a tutoring provider have substantial access to children, have been checked as to their suitability through robust safer recruitment processes including references, verification of their identity, qualifications and a satisfactory DBS check, a prohibition check and where relevant (according to guidance) an overseas check and a Single Central Record (SCR) is kept for audit.
- to ensure consistent good practice across our tutoring services in relation to safeguarding.

1.2 <u>Overview</u>

There are three main elements to Home-School Tutoring's safeguarding policy:

- **<u>PREVENTION:</u>** (a positive and safe tutoring environment for tutors and tutees, careful and vigilant teacher, good adult role models, accessible support for tutees).
- **<u>PROTECTION:</u>** (Agreed procedures are followed, tutors are supported to respond appropriately and sensitively to safeguarding concerns).
- **<u>SUPPORT:</u>** (Appropriate vigilance and support of pupils who may have been at risk of significant harm and the way that tutors respond to concerns and any work that may be required.)

  Everyone at Home-School Tutoring recognises the fact that they do not operate in isolation. We are a team and support each other in safeguarding and child protection issues. We reflect and re-evaluate our actions to consider if there is anything more that we can do. Our mantra is 'compassion and challenge', and we are all empowered to challenge each other in a

compassionate manner. Safeguarding is the responsibility of all adults and especially those working or volunteering with children. Home-School Tutoring aims to help protect the children in its care by working consistently and appropriately with all agencies to reduce risk and promote the welfare of children. All professionals work within the same child protection/safeguarding procedures set out in this policy.

We should all remain professionally curious and should professionally challenge anything we have a question or concern about.

1.2 Definitions

Safeguarding and promoting the welfare of children means (as stated in KCSIE 2025):

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside of the home, **including online**
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18. Child Protection is part of the definition above and refers to activities undertaken to prevent children suffering, or likely to suffer, significant harm. Safeguarding is what we do for all children and Child Protection is what we do for children who have been harmed or are at significant risk of being harmed.

Section 2: Legal Framework

Everyone who comes into contact with children and their families has a role to play in safeguarding. To safeguard and promote the welfare of children, Home-School Tutoring understands the importance of the following legislation and guidance:

- The Children Act 1989
- The Children Act 2004
- Education Act 2002 (section 175)
- The Education (Pupil Information) (England) Regulations 2005
- Keeping Children Safe in Education (KCSIE) 2025: Statutory Guidance for Schools and Colleges (DfE guidance)
- Working Together to Improve School Attendance (DfE August 2024)
- Working Together to Safeguard Children (DfE December 2023)
- Prevent Duty Guidance: for England and Wales (July 2015)
- Online Safety Act (September 2023)

Working Together to Safeguard Children (DfE 2023) requires all schools and Alternative Provision to follow the procedures for protecting children from abuse. Schools and Alternative Provision are expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child has been abused or are at risk of abuse – these procedures should also

cover circumstances in which a member of staff is accused of, or suspected of, abuse.

We fully recognise that safeguarding is everyone's responsibility. The time tutors have with pupils is generally comparatively short compared to time at school. However, the 1:1 relationship is one where trust quickly builds, and a tutor may easily be the person a pupil chooses to confide in.

All pupils receiving tuition should feel able to talk to their tutor to share concerns or talk about situations which are giving them worries. The tutor will listen to the pupil, take their worries seriously and share the information in the appropriate way and to the appropriate person. In addition, we can provide pupils with information about who they can talk to outside of school/home, both within the community and with local or national organisations who can provide support or help.

Section 3: Multi-Agency Working: Working Together

3.1 Multi-Agency Working: The importance of working together

Whilst tutoring can sometimes seem as if you are operating individually, it is imperative that tutors see themselves as part of a 'team around a child'. Home-School Tutoring works in partnership with schools, families, and other agencies to support safeguarding and child protection issues. Safeguarding is the responsibility of all adults and especially those working or volunteering with children. Home-School Tutoring aims to help protect children by working consistently and appropriately with all agencies, including schools, to reduce and promote the welfare of children.

We are committed to promoting effective working relationships with other agencies, including agencies providing E**arly Help Services to children and families** and Children's Social Care. Early Help is organised in different ways across the UK. Early Help is the provision of support services to prevent issues escalating. Our Area Directors make sure they are aware of local arrangements for Early Help and area specific Early Help contacts are on the front of this policy. Home-School Tutoring has a child centred and co-ordinated approach to safeguarding. **Home-School Tutoring works with other agencies (including schools) as required on all safeguarding issues (both current and possible in the future). KCSIE 2025 Annex B** contains important additional information about specific forms of abuse and safeguarding issues which are a current focus and concern for the DfE. All staff who work directly with children must read this annex on an annual basis.

Home-School Tutoring partner with schools and Local Authorities as well as private clients who are parents or carers.

Home-School Tutoring Head Office along with the Area Directors have the ethos that tutoring should have the same focus and standard of safeguarding as schools. We see ourselves as part of the team of professionals that work with children and young people. Area Directors across the UK are almost all qualified teachers, and many have had school leadership and Headship experience. Safeguarding is at the heart of what we do.

We work with hundreds of schools across the UK and have centralised policies and procedures to

ensure that our tutors can effectively work in partnership with schools and be part of a team of professionals who work effectively with children and young people.

Safeguarding is everyone's responsibility at Home-School Tutoring. Everyone who has contact with families and children has a role to play. To fulfil this responsibility effectively, all Home-School Tutoring representatives need to make sure that their approach is child centred. This means they should always consider what is in the child's best interest.

No one person can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who encounters them has a role to play in identifying concerns, sharing information, and taking prompt action.

Section 4: Home-School Tutoring's Safeguarding Ethos

4.1 Home-School Tutoring Tutors and office staff will work together in partnership with pupils and parents to:

- Maintain and continue to create an environment in which all children and young people feel safe, secure, valued, and respected and where they can learn and fully develop.
- Establish and maintain an environment where children are encouraged to talk and are listened to when they have a worry or concern. Ensure children know they can approach a trusted adult if they are worried.
- Ensure all Home-School Tutoring tutors and office staff maintain a culture of vigilance and have an attitude of 'it could happen here' where safeguarding is concerned and that when issues arise about the welfare of a child, staff members always act in the interests of the child.
- Establish and maintain an environment where tutors and office staff are encouraged to share and are listened to when they have concerns about the safety and wellbeing of a child.
- Ensure that all tutors know the procedures for reporting a concern or making a child protection referral and that tutors are well equipped to spot signs of abuse or a child in need of early help for a variety of reasons.
- Ensure that we have suitable tutors by adhering to safer recruitment processes and ensuring any unsuitable behaviour is reported and managed quickly using the allegations manage.
- Liaise and work together with other support services and agencies involved in safeguarding children, including Early Help and preventative services.

4.2. Working in Schools and the Statutory Framework

It is vital that any tutors or office staff working in partnership with schools and Local Authorities understand that statutory duty placed on schools for safeguarding and child protection. Schools are particularly important in relation to safeguarding.

Keeping Children Safe in Education (KCSIE) 2025 places the following responsibilities on all schools:

- school and college staff are particularly important, as they are able to identify concerns early, provide help for children, promote children's welfare, and prevent concerns from escalating.
- all staff have a responsibility to provide a safe environment in which children can learn

• all staff should be prepared to identify children who may benefit from Early Help. Early Help means providing support as soon as the problem emerges at any point in a child's life, from the foundation years through to teenage years.
• any staff member who has a concern about a child's welfare should follow the referral processes set out in this policy (see front cover for contacts). Staff should expect to support social workers and other agencies following any referral.
• every school and college should have a Designated Safeguarding Lead (DSL), who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as local authority children's social care. Every Home-School Tutoring Area Director is also a DSL.
• The DSL (and any deputy DDSLs) are most likely to have a complete safeguarding picture and be the most appropriate person to advises on the response to safeguarding concerns.

KCSIE Sept 2025 also states: ALL staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. Copies of Part One of KCSIE September 2025 and Annex B will be provided to staff on induction (this includes volunteers and tutors working with a specific school).

Home-School Tutoring provide Annual Safeguarding updates to tutors, like those provided to teachers in schools, which include key updates for Keeping Children Safe in Education 2025.
Tutor working with schools will uphold that schools own safeguarding and child protection policy and all other policies and work in partnership with them. **It is imperative and required that if a tutor is working with a school that they have read the schools own Safeguarding and Child Protection Policy and understand the safeguarding procedures for that school and FOLLOW those procedures**. In addition, in relation to any pupils they may work with the tutor should ask the school if there is any information that they should know about the pupil in relation to any safeguarding concerns. The school will share this on a 'needs to know' basis as required. The school should have their own procedures for this happening automatically with external education providers. However, it is always important for tutors to ask and check.

Section 5: Home-School Tutoring's Commitment to Equality

Everyone at Home-School Tutoring will make sure that all children and young people have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity. This policy supports our commitment to anti-discriminatory practice, recognising the additional needs of children from minority ethnic groups and disabled children and the barriers they may face, especially around communication.

5.1 Safeguarding specific vulnerable groups

Any child learning through Home-School Tutoring may benefit from Early Help (help from charities, schools, agencies or professionals with a particular issue or problem). All schools are required to have an offer of Early Help which can be referred to in each local area (for key sources of help for key safeguarding issues). However, every member of tutor is expected to be particularly alert to the potential need for early help for any child who:
• is disabled or has certain health conditions and has specific additional needs

- has special educational needs (whether or not they have a statutory Education, Health Care plan)
- has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home, or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or Pupil Referral Unit.
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is at risk of 'honour' based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child or a Child in Care (CiC) or Post Looked After Child (PLAC)

Home-School Tutoring recognises that some pupils can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in these groups of pupils.

Section 6: Safer Recruitment

6.1 Home-School Tutoring is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with children and young people.
6.2 Home-School Tutoring operates a safer recruitment process in-line with Keeping Children Safe in Education 2025. Please refer to our Safer Recruitment Policy.
6.3 For schools' work and work with Local Authorities local offices maintain a Single Central Register inline with schools and we verify to schools and Local Authorities that the appropriate checks have been made.

Section 7: Training

Home-School Tutoring understands that providing annual and ongoing Safeguarding Training and Updates for Tutors is a central priority:

Annual and ongoing safeguarding updates are made available to tutors via the Area Directors of their branch of Home-School Tutoring. Policies and guidance are also regularly updated. For all tutors working with schools or Local Authorities our aim is that the training and information provided is commensurate to what schools provide their staff.

Home School Tutoring:

- **Has a Child Protection/Safeguarding Policy and procedures in place which is reviewed**

annually.

- **Ensures any weaknesses in Child Protection are addressed and remedied immediately.**
- **Keeps up to date with local and national safeguarding priorities.**

For 2025-2026 all tutors working with schools and Local Authorities:

- **Have been given a briefing on the key changes in KCSIE 2025**
- **Have read and signed to say they understand KCSIE September 2025 Part 1 and Annex B**
- **Have read and signed to say they understand Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings (Feb 2022)**
- **Have signed an updated copy of HST ICT, Technology and social media Acceptable Use Policy for Tutors.**
- **Have read and signed an annual DBS declaration**
- **Have read and signed to say they understand the Tutor Code of Conduct/Behaviour Policy.**

Additional training and information is area specific, and will be varied according to the specific requirements of schools and Local Authorities. Additional training and information is provided on induction of new tutors.

Section 8: Home-School Tutoring: Designated Safeguarding Leads

At Home-School Tutoring UK the named Designated Safeguarding Lead (DSL) for each area is the Area Director (please see front cover for contact details).

The overall National DSL (Designated Safeguarding Lead) for Home-School Tutoring UK is Annalise Price-Thomas (MA (Oxon), PGCE, NPQH). Annalise is an experienced DSL and has completed the DSL training. Annalise Price-Thomas is also an experienced Head Teacher. Jane Bee is our national safeguarding partner. We liaise with Jane Bee when we need additional support. Jane worked as a LADO (Local Authority Designated Officer) for 12 years and chaired the SW LADO group for 8 years. She was elected as the first National LADO Network Chair in 2016, negotiating with DfE and Ofsted: https:// janebeesafeguarding.com

The DSL role for Home-School Tutoring is not the same as a school DSL as we are a different context. However, we are responsible for supporting and enabling good safeguarding practice with each other, as required, as well as keeping our own knowledge up-to-date and keeping track of DfE updates and requirement for schools, as schools are key partners.

- **For private tutoring any safeguarding concerns should be discussed with the Area Director in the first instance. If a child is <u>at Risk of Serious Harm</u>, then the Local Authority's Children's Services should be contacted immediately. In an emergency call 999 or 111.**

- **All Schools have their own Designated Safeguarding Leads and this is a statutory requirement. If a tutor is providing tutoring for a school, then the school's own policy and safeguarding procedures will be followed. Tutors will familiarise themselves with these policies. They should also note the name of the school DSL (Designated Safeguarding Lead). Below is an overview of what DSLs and DDSLs do in schools:**

Broad overview of DSLs (Designated Safeguarding Leads) and DDSLs (Deputy Designated Safeguarding Leads) responsibilities in Schools:

- The overall responsibility for safeguarding and child protection rests with the DSL and this responsibility cannot be delegated.
- Supporting staff with their safeguarding duties.
- Every school should have a DSL who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
- Ensure all cases of suspected abuse to the Local Authority Children's Social Care team and to the Police (cases where a crime may have been committed).
- Liaise with the head teacher and inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Act as a source of support, advice, and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Ensure effective written records are kept regarding safeguarding matters including keeping written records of concerns about children, even when there is no need to refer the matter immediately ('watching brief'). Ensure all records are kept securely; separate from the pupil main files.

Section 9: Reporting and Record Keeping

Home-School Tutoring Procedures for Reporting Safeguarding Child Protection Concerns, Incidents or Disclosures:

- Any concerns or incidents raised when working with in school situation (where a tutor is tutoring in school) should be reported to the schools Designated Safeguarding Lead (DSL). This should be done as quickly as possible after the concern is raised. If they are unavailable, ask to speak to the Headteacher.
- If the concern is in relation to a private tutoring client, then this should be raised with the Area Director first (**unless the child is at risk of immediate harm in which case immediate action should be taken and the police called and children's social services)**.Tutors should not delay in reporting concerns and make a referral to Children's Social Services if they cannot first get hold of their Area Director.
- When tutoring for a Local Authority the process for reporting concerns should be clarified at the start of any new tutoring assignment.
- For all concerns or referrals to Children's Social Care all information should be shared as accurately

and factually as possible in writing. If the initial referral is verbal, it should still be written up afterwards. A written record of a concern should include:

- Date and times of observations
- Dates and times of any discussions in which they were involved
- Any injuries
- What action was taken
- Any actual words or phrases used by the child/adult
- Any questions the staff member asked (remembering not to ask leading questions)

The record must be signed and dated (or equivalent on electronic based records).

- All Registered Tutors should report any incidents or disclosure or concerns that they have without delay to their Home-School Tutoring Area Director who is the local Designated Safeguarding Lead for their Home-School Tutoring area.
  - The HST Area Director will take the responsibility to report incidents of any potential abuse to the relevant Department in the Local Education Authority. However, tutors are also empowered to make referrals and should not delay doing so if they are unable to get hold of their Area Director or anyone else.
  - Home-School Tutoring UK will give support to the HST Area Directors as required. Annalise Price-Thomas is the national DSL for Home-School Tutoring. We also use Jane Bee as our Home-School Tutoring safeguarding partner as required: https:// janebeesafeguarding.com
  - If at any time a Registered Tutor or the HST Area Director genuinely believes that a particular situation is urgent and a child or young person is at immediate risk of significant harm, then the decision should be taken to act immediately by calling 999 and follow up with the additional procedures of reporting afterwards.
  - The Area Director/DSL will ensure that records are kept recording any decisions taken and justifications for decisions are recorded, and outcomes documented.
  - Safeguarding records are kept in accordance with Data Protection Act 2015 and UK General Data Protection Regulation (UK GDPR).

Section 10: Confidentiality:

All tutors recognise that all matters relating to child protection are confidential.

- Information will be shared only between professionals on a 'need to know' basis.
- Child Protection concerns and records are kept in a confidential and secure away from the main pupil files. Safeguarding records are kept in accordance with Data Protection Act 2015 and UK General Data Protection Regulation (UK GDPR).
- The DSL or DDSLs will only disclose information about a child to other members of staff or other professionals on a need-to-know basis only.
- All tutors must be aware that they have a professional responsibility to share information with other agencies to safeguard children.
- All tutors must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.

- We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.

Section 11: Dealing With a Disclosure

Tutors are reminded that children are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused. Recipients of a student's disclosure of abuse or neglect have a responsibility to observe, record and report, but not to question and test the evidence. In such circumstances tutors will:

- Not guarantee confidentiality
- Listen with care
- Reassure the student that he/she is not to blame
- Not show disbelief, always take the allegation seriously
- Affirm the student's feelings as expressed
- Avoid being judgmental about the information disclosed
- Avoid a 'whodunit' approach
- Stay calm & avoid an emotive response such as looks of shock or embarrassment.
- Refer the issue to Children's Services or school DSL
- Sign and date notes made
- Where there is an online element, the key consideration is for tutors not to view or forward illegal images of a child. Where viewing images is unavoidable, the following link provides advice on how to respond: Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024) - GOV.UK

The primary functions of the tutor are to listen and record and not to interrogate. Any questions should be aimed at obtaining basic information only, and they must be open ended and not leading. There is a real danger of making evidence invalid should police involvement be needed at a later date. These written records will be passed to the DSL.

- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know. Reassure them.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. The record must be signed and dated by the author (or equivalent on electronic based records). Include any questions you may have asked. Do not add any opinions or interpretations.

IMMEDIATELY AFTERWARDS: You MUST NOT deal with this yourself. Clear indications or disclosure of abuse must be reported to Children's Social Care without delay. In a school seek out the Designated Safeguarding Lead. In a private client situation immediately contact your Area Director but refer immediately to Children's Social Care if you cannot get hold of them (see contact details on front sheet of this policy). **If the child is at immediate risk, you must call the police and do not wait. If there is a**

risk of serious harm contact your local Children's Helpdesk for Safeguarding referrals (see page 1 of this policy for contact details) or call the police (999/111). Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Area Director or if you are working with a school from the schools Designated Safeguarding Lead too.

Section 12: Allegations Management

All tutors should take care not to place themselves in a vulnerable position with a child.
It is always advisable for sessions with individual children to be conducted in view or near to adults. As per our policies, tuition is never in a child's bedroom or upstairs in a private home. There should also be a parent/guardian or other responsible adult in the home (nominated by the parents or guardians) when tuition is taking place.

We understand that a pupil, parent or other professional may make an allegation against a tutor. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform Annalise Price-Thomas (Home-School Tutoring Head Office Designated Safeguarding Lead). On all such occasions Annalise Price-Thomas will discuss the content of the allegation with the relevant Local Authority Designated Officer (LADO). If the allegation made is regarding an Area Director, then Annalise Price-Thomas should be informed. If an allegation is made regarding Annalise Price-Thomas, the person receiving the allegation will immediately inform Jane Bee (janebeesafeguarding@gmail.com) who will consult with the LADO as above, without notifying Annalise Price-Thomas first. Home-School Tutoring will always follow the Local Safeguarding Children's Partnership (a statutory multi-agency partnership board) procedures for managing allegations. We will contact the LSCP (Local Safeguarding Children's Partnership) nearest the home address of the person who has had an allegation made about them.

If you believe that a member of staff in a school or local authority is harming a child (an allegation) then you should report this to the headteacher of the school or to the LADO (Local Authority Designated Officer) of the Local Authority if a Local Authority member of staff. If you have made the report and no/insufficient action has been taken, or the member of staff you have concerns about is a Headteacher then you are able to contact the Local Authority Designated Officers team (LADO). This can be found online, or you can ask your Area Director.

If you believe that a child is being abused by individuals outside of a school setting, then please make a referral to Children's Social Care. The contact is on the front sheet of this policy. Further guidance can be accessed through the NSPCC website: https://www.nspcc.org.uk/what-is-child-abuse/ and https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2

Low Level Concerns

'Low Level Concerns' - Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt

with appropriately, is critical. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working with young people may have acted in a way that is inconsistent with the tutor or school code of conduct, including inappropriate conduct outside of work; and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:

- being over friendly with children.
- having favourites.
- taking photographs of children (without permissions in place)
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- 'humiliating pupils.'

Such concerns such always be shared, recorded and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Whistleblowing

Home-School Tutoring has a Whistleblowing Policy. Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems. There are a limited numbers of areas that can be called Whistleblowing and it is our policy that no-one is punished for raising concerns.

Everyone at Home-School Tutoring should be aware that they can raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of others working in or for the organisation. In the first instance please speak to your Area Director if it is about another tutor in your area. Or you can contact Annalise Price-Thomas (DSL Home-School Tutoring Head Office) email: annalise@homeschooltutoring.co.uk.

The NSPCC whistleblowing helpline is available for people who do not feel able to raise concerns regarding child protection failures internally. You can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

Section 13: Health and Safety

- Tutors are empowered to put their own health and safety first. If they are even in doubt, they should leave a home or in an emergency call 999. Generally, tuition is a low-risk occupation due to the nature of the work where parents/carers have requested the tuition, or a school have organised it and families are pleased to receive it. This contrasts with social work where the work and response of a family can be more contentious. However, health and safety requires vigilance at all times.
- All tutors should read the document **'Risk Assessment for Tutoring in Homes'**
- Tutors **must** always carry with them the '**Parental Consent and Medical Form (for Offsite Visits or**

Parents not Present)' IF taking a pupil on a trip or tutoring them out of the home or school (schools generally have their own versions). This is so that the tutor has emergency contact for the pupil, allergy/medical information and emergency medical contacts and consent for treatment of minor and major injuries in the event of an emergency where parents/carers were not contactable.

- When working in schools, tutors must follow each schools Health and Safety policies and procedures.

First Aid

The responsible adult (parent/guardian) on site should be called to attend any first aid requirements during tuition sessions. In a school setting the First Aid responsibility sits with the school. If a tutor is taking a pupil off-site in exceptional circumstances (out of home or school) they must have the relevant medical and consents with them at all times. For Home-School Tutoring this is the **'Parental Consent and Medical Form (for Offsite Visits or Parents not Present).' Schools will have their own forms and policies. However, our preference and usual procedure is for parents/carers or school staff to be present in all circumstances.**

Physical Intervention (use of reasonable force)

Physical contact should not be necessary. Tutors should not use physical restraint.
If a pupil's behaviour is unreasonable in a tutoring situation in the home the parents/carers should be asked to intervene as no tutoring will occur without a responsible adult present. If things do not improve the session will end. If the tutoring in the home has been on behalf of a school or LA, then the school or LA will be consulted and informed. The Area Director should also be informed. Poor behaviour is rare in a 1:1 tutoring situation.

Taking and the Use and Storage of Images

Tutors should NOT take photographs or videos of their pupils for professional reasons unless they have made a specific request to do so, and they have written consent in advance from the parent/carer. If collaborating with a school the school will have their own policy and consent forms for tutors to follow.

Social Media

It is not appropriate for tutors to be "friends" with pupils on any social media platform. This includes all children under the age of 18 even if you no longer teach them or tutor them until they have left school and college. Please refer to the Home-School Tutoring 'ICT and social media Acceptable Use Policy for Tutors.'

Transporting Pupils

Tutors will not transport pupils in their vehicles unless express written permission is given by the parent or guardian and the driver is fully, comprehensively insured for **business use. Relevant checks will be undertaken by HST offices including MOT, Drivers Licence and insurance held by the tutor.** The tutor must also have the '**Parental Consent and Medical Form (for Offsite Visits or Parents not Present)'** completed by a parent/carer and with them if transporting a pupil without the parent/carer present as well as a RISK ASSESSMENT. The exception to this would be if a tutor is working with school and the school

have their own 'off-site/transportation form.' In general, though Home-School Tutoring do not transport pupils.

Section 14: Policy Review

As an organisation, we will review this policy at least annually in line with DfE and other relevant guidance. The next review date is August 2026 unless relevant guidance is updated before this date.

Safeguarding processes are intended to put in place measures that minimise harm to children. There will be situations where gaps or deficiencies in the policies and processes we have in place will be highlighted. In these situations, a review will be carried out immediately in order to identify learning and inform the policy, practice and culture of our company.

We sincerely hope that our tutors will not have the need for this information but ask that all tutors read (and sign to confirm that they have read) this policy, so that we can perform our safeguarding duties to the best of our abilities.

Annalise Price-Thomas MA (Oxon), PGCE, NPQH
Managing Director and Designated Safeguarding Lead
Home-School Tutoring UK
Reviewed August 2025 (next review date August 2026 unless relevant guidance is updated before this date)

APPENDICES

Appendix 1: Safeguarding Procedures Definitions

Definitions:

- Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults or another child or children.
- Children are any people who have not yet reached their 18th birthday; a 16-yearold, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSIE now applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021.
- Child protection is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm, or significant harm is suggested.
- Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children rather than reacting later. Early help can

be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support.

- Harm is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.
- Safeguarding children is the action we take to promote the welfare of children and protect them from harm.
- Significant harm is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 47 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child.'

Categories of Abuse:

1.Physical Abuse
2.Emotional Abuse (including Domestic Abuse)
3. Neglect (the three types of Neglect)
4. Sexual Abuse

1.PHYSICAL ABUSE

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

2. EMOTIONAL ABUSE

•**Emotional** abuse is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development and conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may include:
• not giving the child opportunities to express their views
• deliberately silencing them or 'making fun' of what they say or how they communicate
It may feature:
• age or developmentally inappropriate expectations being imposed on children
• interactions that are beyond a child's developmental capability
• overprotection and limitation of exploration and learning,
• preventing the child from participating in normal social interaction.
• seeing or hearing the ill-treatment of another
• serious bullying (including cyberbullying)

• causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

3. NEGLECT

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- **provide adequate food, clothing and shelter (including exclusion from home or abandonment).**
- **protect a child from physical and emotional harm or danger.**
- **ensure adequate supervision (including the use of inadequate caregivers); or**
- **ensure access to appropriate medical care or treatment.**

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Educational neglect is also considered: https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/neglect/

Types of Neglect (there are THREE TYPES):
There are three overarching types of neglect that may be experienced by children and young people (Jones, R, 2016):
1. Passive Neglect: where the parents/carers are often exhausted and may be suffering from poor mental health. Signs/indicators of passive neglect include chronic poverty, poor housing/financial difficulties, alcohol use, no boundaries and not care for children/school attendance issues and no extended family support.
2. Chaotic Neglect: where parents/carers may have poor parenting skills or be centred on their own needs. Signs/indictors of chaotic neglect are poor parenting, no good parenting models, parent focussed on their own needs, parents who are active and demanding but also chaotic and unpredictable.
3. Active Neglect: deliberate and intentional. Signs of active neglect include power and control, associated with domestic

An example of a Neglect Toolkit for professionals can be found here: East-Sussex-Neglect-Toolkit-Web.pdf (eastsussexlscb.org.uk)

4. SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not

the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children (also known as peer or peer abuse) is a specific safeguarding issue in education staff should be aware of and the school or college's policy and procedures for dealing with it. Children Sexual Exploitation can happen to BOYS and GIRLS.

Child Criminal Exploitation (CCE)
CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into a criminal activity (a) in exchange for something the victim needs or wants and / or (b) for financial or other advantage of the perpetrator or facilitator and / or (c) through violence or threat of violence. The victim may have been criminally exploited even if the activity seems consensual. CCE does not always involve physical contact: it can also include use of technology.

Abuse and Neglect and Children with Special Educational Needs:
Children with Special Educational Needs (SEN) and Disabilities can face additional safeguarding challenges. It is important that all education recognise the fact that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:
• assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
• children with SEN and Disabilities can be disproportionally impacted by things like bullying- without outwardly showing any signs; and
• communication barriers and difficulties in overcoming these barriers.

Abuse of Looked After Children and Previously Looked After Children
A previously looked after child remains potentially vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken on concern to safeguard these children who are particularly vulnerable.

Appendix 2: Further information on current high-profile safeguarding issues

KCSIE Annex B contains important additional information about specific forms of abuse and safeguarding issues. All Area Directors and tutors will read Annex B and familiarise themselves with the most current issues. The Content in Annex B for 2025 is:

Child Abduction and community safety incidents
Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
County Lines
Children and the court system
Children who are absent from education
Children and family members in prison
Cybercrime
Domestic Abuse
Homelessness
Mental Health
Modern Slavery and the National Referral Mechanism
Preventing Radicalisation
The Prevent Duty
Channel
Sexual violence and Sexual harassment between children in schools and colleges
Serious Violence
So-called 'honour 'based abuse (including Female Genital Mutilation and Forced Marriage)
FGM
FGM Mandatory Reporting
Forced Marriage

In line with KCSIE September 2025, we make tutors aware of the risks of Child Sexual Exploitation and Criminal Exploitation, alongside serious violence. The below text gives an overview of these harms and how to identify children who may be at risk of these harms:

<u>Children Missing from Education</u>
Working Together to Improve School Attendance **(now referenced within *Keeping Children Safe in Education 2025*) is now statutory guidance. We acknowledge that persistent or unexplained absence may be an indicator of safeguarding concerns.** Attendance monitoring therefore forms part of our safeguarding practice, and concerns will be escalated to the Designated Safeguarding Lead (DSL) and to the school or Local Authority who have commissioned tutoring without delay. At the start of any commissioned tutoring for a school or Local Authority we will agree how attendance is reported. We will work closing with schools and Local Authorities in terms or notifications of absences. Home-School Tutoring will agree how best to do this with schools or Local Authorities we are commissioned to work with. We do have a live reporting protocol we can offer.

Children who have unexplainable and/or persistent absence from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (from KCSIE 2025)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources. Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education. Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

County Lines County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social

media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Serious Violence

Serious violence There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy (look up Serious Violence in KCSIE 2025 for this link).

So-called 'Honour'-Based Abuse (including female genital mutilation and forced marriage)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies.

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

FGM Mandatory Reporting

FGM is illegal in the UK. You must report FGM to the policy without delay if you suspect or discover FGM (e.g. by disclosure by the victim). There is a mandatory duty on educators to do this.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation: procedural information - GOV.UK

If there is suspicion that FGM is planned then this also should be reported to the police and to the relevant children's social care WITHOUT DELAY. You must personally report this but also inform the school DSL and Home-School Tutoring DSL.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges and everyone working with children can play an important role in safeguarding children from forced marriage.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. **As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.** If anyone suspects a forced marriage the police should be contacted without delay.

It is important that tutors recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice.

Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care. Forced Marriage Unit can be contacted for advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Characteristics that may indicate forced marriage

While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including:

- an extended absence from school/college, including truancy;
- a drop in performance or sudden signs of low motivation;
- excessive parental restriction and control of movements;
- a history of siblings leaving education to marry early;
- poor performance, parental control of income and students being allowed only limited career choices;
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; and/or
- evidence of family disputes/conflict, domestic violence/abuse or running away from home.

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

Sexual harassment, violence, harmful sexual behaviours (inc. child on child abuse, consent and 'upskirting')

Sexual harassment, violence, harmful sexual behaviours (inc. child on child abuse, consent and 'upskirting') Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration and sexual assault.

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child, sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Staff/tutors must challenge any form of derogatory and sexualised language or behaviour. Staff/tutors should be vigilant to sexualised/aggressive touching/grabbing. DfE guidance situates sexual violence, sexual harassment, and harmful sexual behaviour in the context of developing a whole-school safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up.

Groups at particular risk include girls, students who identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+), or are perceived by peers to be LGBT+, and pupils with SEND. We recognise that these children can be targeted by other children, so it is vital there are safe spaces for these children to speak out and share their concerns with members of staff. Pupils must be protected from 'upskirting', bullying, homophobic, biphobia and transphobic behaviour, racism, sexism, and other forms of discrimination.

Home-School Tutoring acknowledges the need to treat everyone equally, with fairness, dignity, and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also acknowledge that schools have a statutory duty to report and record any of the above incidents and will work with schools on this matter. Schools must record incidents across the whole spectrum of sexual violence, sexual harassment, and harmful sexualised behaviours so that they can understand the scale of the problem in their own schools and make appropriate plans to reduce it. All such incidents should be immediately reported to the schools Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies. Victims of harm should be supported by the school's pastoral system and, and their wishes and feelings considered and that the law on child-on-child abuse is there to protect them, not criminalise them.

The appropriate safeguarding lead person should be familiar with the full guidance for Sharing nudes and semi-nudes: advice for education settings working with children and young people: Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024) - GOV.UK

Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual consent

- a child under the age of 13 can never consent to any sexual activity.
- the age of consent is 16.

Child on child abuse (previously referred to as peer on peer abuse)

All tutors should be aware that children can abuse other children (previously referred to as peer-on-peer abuse); that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of child or child abuse and know how to identify it and respond to reports. All staff/tutors should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer-on-peer abuse, they should speak to their designated safeguarding lead (or deputy). It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just

having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Child on child abuse is most likely to include, but may not be limited to:

• Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
• abuse in intimate personal relationships between peers;
• physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens, and/or encourages physical abuse);
• sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens, and/or encourages sexual violence);
• sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
• causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
• consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
• upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
• initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All tutors should be clear as to the school's or college's policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they are tutoring.

Fabricated or Induced Illness / Perplexing Presentation

Staff must be aware of the risk of children being abused through fabricated or induced illness (FII). There are three main ways of the carer fabricating or inducing illness in a child. These are not mutually exclusive and include:
• fabrication of signs and symptoms. This may include fabrication of past medical history.
• fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents.
• induction of illness by a variety of means.
Where this is identified and considered a risk a referral will be made to the MASH for support and guidance. School may involve other agencies in making their assessments. That could include school nurse, community paediatrician, occupational therapists for example.

Mental Health

All staff/tutors should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained

professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies.

Preventing Radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of our safeguarding approach**.** During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. **KCSIE 2025 has updated the definition of extremism.**

- Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.
- Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, tutors should be alert to changes in children's behaviour which could indicate that they may need help or protection. Tutors and Area Directors will use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include contacting the National Police Prevent Advice Line.

Individuals or schools should not investigate radicalisation, but a referral or concern can be reported or discussed via the national Police Prevent Advice line Tel: 0800 011 374, Call 999 in an emergency.

From 1 July 2015 all schools are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 ('The CTSA 2015'). Schools must have regard to statutory PREVENT GUIDANCE issued under

section 29 of the CTSA 2015. Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools' responsibility to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies.

Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales https://www.gov.uk/government/publications/prevent-duty-guidance

The Department for Education has also published advice for schools on the Prevent duty and is intended to complement the Prevent guidance and signposts other sources of advice and support. https://www.gov.uk/government/publications/protecting-children-fromradicalisation-the-prevent-duty

Anyone who is referred to Prevent is assessed by Local Authority and other partners, including the police to see if they are suitable for Channel. Channel is a programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be susceptible to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages and an individual will be required to provide their consent before any support delivered through the programme is provided.

Technologies and Online Safety

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

• content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, antiSemitism, radicalisation and extremism.

• contact: being subjected to harmful online interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other

• conduct: online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying

• commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/)

Online Safety

Homepage - UK Safer Internet Centre With the current speed of on-line change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond. It is essential that children are safeguarding from potentially harmful and inappropriate material online.

Online Reputation

http://www.childnet.com/resources/online-reputation-checklist Online reputation is the opinion others get of a person when they encounter them online. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that children and tutors are aware that anything that is posted could influence their future professional reputation. The majority of organizations and work establishments now check applicants' digital footprint before considering applications for positions or places on courses.

Grooming

Online grooming is the process by which one person with an inappropriate sexual interest in children will approach a child online, with the intention of developing a relationship with that child, to be able to meet them in person and intentionally cause harm.

Awareness can be shared amongst children and parents about ensuring that the child:

- Only has friends online that they know in real life.
- Is aware that if they communicate with somebody that they have met online, that relationship should stay online.

That parents should:

- Recognize the signs of grooming.
- Have regular conversations with their children about online activity and how to stay safe online.

Cybercrime

Cybercrime is mentioned in KCSIE 2025. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

• unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded

• 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,

• making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently

cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Risks Associated with Parent/Carer Mental Health

Most Parents who suffer mental ill-health can care for and safeguard their children and/or unborn child. Some parents, however, will be unable to meet the needs and ensure the safety of their children. Designated Safeguarding Lead should seek support through the Early Help team but escalate to Children’s Social Care if they are concerned that the child involved is being placed at immediate risk of harm.

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All parents will struggle with the behaviour of their child(ren) at some point. This does not make them poor parents or generate safeguarding concerns. Rather it makes them human and provides them with opportunities to learn and develop new skills and approaches to deal with their child(ren). Some children have medical conditions and/or needs e.g., Tourette’s, some autistic linked conditions, ADHD; that have a direct impact on behaviour and can cause challenges for parents in dealing with behaviours. This does not highlight poor parenting either.

Parenting becomes a safeguarding concern when the repeated lack of supervision, boundaries, basic care, or medical treatment placing the child(ren) in situations of risk or harm.

This policy has been developed taking in to account the principles established by the Children Acts 1989 and 2004; the Education Act 2002 and in line with statutory guidance: ‘Working together to safeguard children’ DfE 2023, and ‘Keeping Children Safe in Education’ (KCSIE), DfE guidance September 2025. This policy has been adapted from models offered by the NSPCC, Hampshire County Council, Oxfordshire County Council and Gloucestershire Hospital Education Service (originally written by Annalise Price-Thomas).